

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

<b>CCC INTELLIGENT SOLUTIONS INC.,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Case No. 1:18-cv-07246</b>
<b>v.</b>	)	
	)	<b>Hon. Robert W. Gettleman</b>
<b>TRACTABLE INC.,</b>	)	<b>Hon. Susan E. Cox</b>
	)	
<b>Defendant.</b>	)	

**JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, Plaintiff CCC Intelligent Solutions Inc. and Defendant Tractable Inc. (collectively, the “Parties”), by and through their undersigned counsel, hereby jointly request that the Court enter the Protective Order attached hereto as Exhibit A. In support of this Motion, the Parties state as follows:

1. The Parties are currently engaged in discovery that involves the production of documents and answers to written discovery requests that may require the disclosure of confidential information, highly confidential information, and source code. It is also anticipated that the parties will participate in additional discovery in the future, including oral depositions of both party and non-party witnesses, that may require the disclosure of confidential information, highly confidential information, and source code. The Parties wish to limit access to such documents and information.

2. Accordingly, the Parties believe that the entry of a protective order is necessary to sufficiently protect confidential information, highly confidential information, and source code, while facilitating open discovery.

3. Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure and in accordance

with the Court's procedures pertaining to protective orders, the Parties have negotiated and reached a consensus as to all terms of the Protective Order attached hereto as Exhibit A and request the Court's entry of that order. *See Bond v. Utreras*, 585 F.3d 1061, 1067 (7th Cir. 2009) ("Protective orders are often entered by stipulation when discovery commences.").

4. The Parties hereby respectfully request that the Court enter the Protective Order attached hereto as Exhibit A.

5. In accordance with the Court's procedures pertaining to protective orders, the Parties have also prepared a redline showing the changes that were made to the Model Protective Order, which is attached hereto as Exhibit B.

WHEREFORE, for the foregoing reasons, the Parties respectfully request that this Court enter the attached order and grant such other relief as it may deem appropriate.

Dated: October 28, 2022

Respectfully submitted,

/s/ Matthew W. Walch

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*Counsel for Plaintiff CCC Intelligent  
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**CERTIFICATE OF SERVICE**

I, Matthew W. Walch, hereby certify that on October 28, 2022, I caused the foregoing to be filed using the Court's electronic filing system which provides service to all counsel of record.

/s/ Matthew W. Walch  
Matthew W. Walch